

DAVIDOFF HUTCHER & CITRON LLP

605 Third Avenue

New York, NY 10158

212.557.7200

David H. Wander, Esq. (dhw@dhclegal.com)

Taylor D. Kopelan, Esq. (tdk@dhclegal.com)

Attorneys for Defendant

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

Personal Communications Devices, LLC, *et al.*,

Debtors.

Case No. 13-74303 (AST)

Chapter 11

(Jointly Administered)

Devices Liquidation Trust,

Plaintiff,

v.

M Seven System Limited,

Defendant.

Adv. No. 15-08112 (AST)

**STIPULATION TO EXTEND DEADLINES FOR
COMPLETION OF MEDIATION AND NON-EXPERT
FACT DISCOVERY**

WHEREAS, on July 21, 2017 this Court entered a scheduling order, ECF No. 37 (“Scheduling Order”), pursuant to which, among other things: (1) the deadline to complete non-expert fact discovery, excluding depositions of fact witnesses, was November 15, 2017; and (2) mediation must be concluded by March 15, 2018;

WHEREAS, the deadlines contained in the Scheduling Order may be extended by consent of the parties pursuant to stipulation, which stipulation needs to be filed with the Court;

WHEREAS, on May 29, 2018 the parties filed a stipulation extending the deadline to complete (a) non-expert fact discovery, excluding depositions of fact witnesses, to September 28, 2018; and (b) mediation to August 29, 2018; and

WHEREAS, the attorneys for the parties have continued to discuss this case, including the defendant's financial condition; and

WHEREAS, the parties are in the process of scheduling the mediation;

IT IS HEREBY STIPULATED & AGREED, by the undersigned, counsel for defendant M Seven System Limited ("Defendant"), and plaintiff Devices Liquidation Trust ("Plaintiff"), that:

1. The deadline to complete non-expert fact discovery, excluding depositions of fact witnesses, is extended to February 28, 2019;
2. Mediation must be concluded by January 31, 2019;
3. This stipulation may be signed in counterparts, and fax/email signatures on the within stipulation may be deemed originals for all purposes.

Dated: New York, New York
November 1, 2018

DAVIDOFF, HUTCHER & CITRON, LLP

By: /s/ David H. Wander, Esq.
David H. Wander, Esq.
605 Third Avenue
New York, New York 10158
(212) 557-7200
dhw@dhclegal.com

Attorneys for Defendant

Dated: New York, New York
November 1, 2018

ASK LLP

By: /s/ Marianna Udem, Esq.
Marianna Udem, Esq.
151 West 46th Street, 4th Floor
New York, NY 10036
(212) 267-7342
mudem@askllp.com

Attorneys for Plaintiff